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January 16 , 2001

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Federal Communications Commission  
Washington, D.C. 20544

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FCC MAIL ROOM

In Re: RM 10018

Subject: Petition of Joseph Speroni, AH0A, a radio amateur, regarding  
re-allocation of certain sub-bands in the amateur radio service

Mr. Joseph Speroni, a radio amateur with the call sign AH0A, has filed a petition with the Commission that has been designated RM 10018 and made available for public comment. This letter is being filed in support of Mr. Speroni's petition.

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As W3ULS, I have been operating with Novice privileges in the Novice sub-bands of the amateur radio HF frequencies since May 1999. Prior to approximately 1955, I operated as a General Class licensee with the W3ULS call sign. Upon re-testing in April 1999, I sought and was awarded a Novice license with the call sign KG4DBD that enabled me to return to the hobby after a lapse of 45 years. As soon as KG4DBD was issued to me, I re-applied to the Commission, under the vanity call sign program, to obtain my previous call sign, and I was fortunate to be able to do so.

(For purposes of this comment letter, all references below to "Novice" privileges should be understood to include "Technician Plus" licensees as well as Technician licensees who have passed the 5 wpm code requirement.)

Now that I have been operating as a Novice for 18 months, I find the license to be of little value. Here are my findings, based on my (limited) operating experience.

**10 Meters SSB** — This little fillip of SSB privileges has been an unalloyed boon. When the solar cycle ebbs, I understand QSO's will become fewer and farther between.

**10 Meters CW** — Not very useful. A look at the "Considerate Operator's Frequency Guide (COFG)," developed, maintained, and published by the American Radio Relay League (ARRL), shows that virtually all of the 10-meter Novice CW sub-band has been set aside for some use or other. Moreover, the QRP CW calling frequency is not in the sub-band. (There was one exception. During the December 2000 10-meter contest run by ARRL, the rules specified a bonus for contacts on CW with

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Novices, and I became, on 10 meters, for a few brief shining moments, not Zasu Pitts but Marilyn Monroe, if you get my drift.)

**15 Meters** — Here again, the QRP CW calling frequency recommended by ARRL's COFG falls outside the Novice sub-band. Thankfully, however, and in contrast to 10 meters, the COFG does not call for competing uses in the Novice sub-band, and it is possible to make good contacts—when the band is open. During periods of low solar activity, 15 meters apparently suffers from the same shortcomings as 10 meters and thus will not be a dependable longer-distance band.

**40 Meters** — Being limited to operating in the Novice sub-band of 40 meters is the radio amateur's equivalent of hell. In this 50 kHz segment, the first 5 kHz are set aside by the ARRL's COFG for "automatically controlled data stations." More importantly, there are a host of strong foreign AM broadcasters. The net result is that 40 meters is mostly useful for Novices as a short-haul daytime band. After about 2100 UTC, when the band begins to open up for longer-distance QSO's, operating in the Novice sub-band at best is a challenge and at worst is impossible. The COFG designates a Novice QRP calling frequency, but it is smack dab in the middle of the QRM.

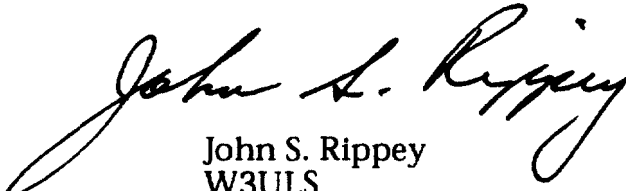
**80 Meters** — The Novice sub-band on 80 meters is quite workable—in the winter months. Again the ARRL's COFG has a QRP Novice CW calling frequency designated. However, I do not understand why, given the 250 kHz spread of the CW/RTTY/Data authority on 80 meters, the Novice sub-band is so narrow, particularly because: (1) foreign amateurs can be heard on SSB in the sub-band in the evening and (2) there is an orphan 25 kHz CW segment above the Novice sub-band.

This thumbnail review highlights the fact that, for Novices, there are no reliable longer-distance frequencies available at night (unless one would suggest 80 meters in the winter and very late). When 10 and 15 meters, which can be useful now for longer-distance QSO's during daylight, close down as solar activity wanes, the picture will be even bleaker. As a result, I now view the obtaining of a Novice license with some degree of consternation. Compared to the privileges accorded me in 1949 as a new General Class licensee, the privileges accorded Novice licensees today are inferior by several orders of magnitude. I fail to comprehend the thinking behind them. I feel I wasted my time (and a 110 mile round trip) to obtain a Novice license.

The FCC's management of the HF portions of the amateur radio spectra, I find, has come full circle since my last encounter with the Commission in 1949. At that time, the General Class license provided entry-level access to the HF bands. With the shortcomings of the Novice privileges, for all practical purposes the General Class license serves the same function today.

Commission either to fish or to cut bait with the Novice privileges. Either expand them to the point of usefulness along the lines proposed by AH0A<sup>1</sup>, or terminate them so once again the General Class license will serve as the entry-level ticket to the HF bands. As it stands today, the Novice, Tech Plus, etc. licenses are hybrids of dubious value that deserve to be put out of their misery.

Sincerely yours,



John S. Rippey  
W3ULS

cc: Hon. George Allen  
Hon. Jo Ann Davis  
Mr. Joseph Speroni, AH0A  
ARRL: Messrs. Haynie, Harrison, Kanode, Sumner, Bodson, Shattuck,  
Gahagan & Ms. Craigie

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<sup>1</sup> I would suggest adding either 30-meter or 17-meter band privileges, or both.